

Deyuan Lin, Esq.  
620 Newport Center Dr., Suite 1100  
Newport Beach, CA 92660  
(949) 409-8860

February 28, 2022

**Via ECF**

The Honorable Jesse M. Furman, U.S.D.J.  
United States District Court  
Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**RE: Thomas J. Olsen Individually and on behalf of all other persons similarly situated vs. Wing Bikes Inc., doing business as Wing Bikes**  
**U.S. District Court, S.D.N.Y., Civ. Action No.: 1:22-cv-00496-JMF**

Dear Honorable Jesse M. Furman:

I represent Defendant Wing Bikes, Inc., b/b/a Wing Bikes (“Defendant”) in the above-referenced matter. I write pursuant to Section 1 (F) of Your Honor’s Individual Rules of Practice in Civil Cases to request a 30-day Extension of Time to March 31, 2022, for Defendant’s Response to Plaintiffs’ Complaint in the matter. The original date to respond to the Complaint was March 1, 2022, this is the first request for an Extension to Respond to the Initial Complaint.

Additionally, Defendant Wing Bikes, Inc., b/b/a Wing Bikes requests an Extension to Submit a Joint Letter to April 14, 2022, in accordance with Rule 16 of the Federal Rules of Civil Procedure. The original due date for the Parties to submit the Joint Letter is March 15, 2022, this is the first request for an Extension to Submit a Joint Letter.

We have met and conferred with Plaintiffs’ counsel, and they consent to our request for an Extension of Time to Respond to the Initial Complaint, and an Extension to Submit a Joint Letter in this matter. The Extensions are needed to analyze and/or investigate the matters set forth in the Complaint, confer with our client, explore settlement, and, if necessary, prepare a response. No previous requests for extensions of time to respond the Complaint or submit a Joint Letter have been made in this case. The requested extensions do not affect any other scheduled dates.

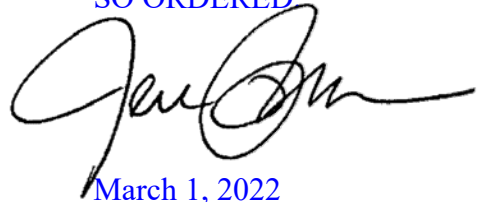
Respectfully submitted,

By: /s/ Deyuan Lin  
Deyuan Lin

CC: /s/ Douglas B. Lipsky (via ECF)

Application GRANTED. Defendant's deadline to answer or otherwise respond to the Complaint is hereby extended to **March 31, 2022**. The parties' deadline to submit a joint letter, the contents of which are described in the Court's January 21, 2022 Order, *see* ECF No. 5, is extended to **April 14, 2022**. Defendant's counsel is reminded to promptly file a notice of appearance on the docket. The Clerk of Court is directed to terminate ECF No. 6.

SO ORDERED

A handwritten signature in black ink, appearing to read "J. Lee", is written over the text "March 1, 2022".

March 1, 2022